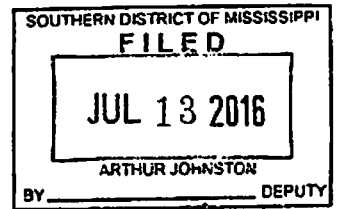


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION



UNITED STATES OF AMERICA

v.

TERESA K. MALONE

CRIMINAL NO. 3:16cr51 HTW-FKB

18 USC § 1349

18 USC § 666(a)(2)

The Grand Jury charges:

At all times relevant to this indictment:

1. The Mississippi Department of Corrections (MDOC) was a state government agency as that term is defined in Section 666(d), Title 18, United States Code, and which received benefits in excess of \$10,000 annually between 2008 and 2014 under Federal programs providing Federal assistance to MDOC.

2. From about 2008 through 2014, AdminPros, LLC was under multiple contracts with the State of Mississippi to provide medical vendor monitoring and Medicaid eligibility services to the Mississippi Department of Corrections (MDOC).

3. The defendant, **TERESA K. MALONE**, was a paid consultant for AdminPros, LLC.

4. AdminPros, LLC paid the defendant, **TERESA K. MALONE**, approximately \$5,000.00 per month from October of 2010 through July 17, 2014, of the revenue generated by the contractual services with the MDOC.

5. **CHRISTOPHER B. EPPS** was the commissioner of the MDOC.

COUNT 1

6. The allegations contained in paragraphs one through five of this indictment are realleged and incorporated herein by reference as though fully set forth herein.

7. From in or about 2010, and continuing until at least July of 2014, in Hinds County, in the Northern Division of the Southern District of Mississippi and elsewhere, the defendant, **TERESA K. MALONE**, did knowingly and intentionally combine, conspire, confederate, and agree with **CHRISTOPHER B. EPPS**, to commit one or more of the following offenses: to devise and intend to devise a scheme and artifice to defraud the Mississippi Department of Corrections and the State of Mississippi and its citizens of their intangible right to **CHRISTOPHER B. EPPS**'s honest services, through bribes and kickbacks, by use of interstate wire transmissions, in violation of Sections 1343 and 1346, Title 18, United States Code.

8. It was the object of the conspiracy that defendant **TERESA K. MALONE** would bribe or provide kickbacks to **CHRISTOPHER B. EPPS**, in exchange for the awarding and the retention of contracts to AdminPros, LLC and, for the exercise of **CHRISTOPHER B. EPPS**'S influence in obtaining a consulting agreement for **TERESA K. MALONE** with AdminPros, LLC.

9. In furtherance of the conspiracy and to carry out its objectives, the following acts, among others, were committed:

10. Beginning in 2010, the defendant, **TERESA K. MALONE**, began regularly providing **CHRISTOPHER B. EPPS** with cash payments in varying amounts, generally \$1,000.00 to \$1,750.00 per payment, in exchange for **CHRISTOPHER B. EPPS**'S influence as commissioner of MDOC to benefit **TERESA K. MALONE**, financially.

11. On or about July 17, 2014, the defendant, **TERESA K. MALONE**, paid a cash kickback to **CHRISTOPHER B. EPPS** in the amount of \$1,750.00, which **MALONE** had obtained through her consulting agreement with AdminPros, LLC.

12. That from in or about 2010, until July 17, 2014, the defendant, **TERESA K.**

MALONE, was paid no less than \$170,000.00 by AdminPros, LLC of which **MALONE** would kickback cash to **CHRISTOPHER B. EPPS**.

All in violation of Sections 1349 and 2, Title 18, United States Code.

COUNT 2

13. The allegations contained in paragraphs one through twelve of this indictment are realleged and incorporated herein by reference as though fully set forth herein.

14. On or about July 17, 2014, in Hinds County, in the Northern Division of the Southern District of Mississippi and elsewhere, the defendant, **TERESA K. MALONE**, did knowingly and corruptly give, offer, and agree to give something of value, that is, \$1,750.00 in cash, to **CHRISTOPHER B. EPPS**, with intent to influence and reward **CHRISTOPHER B. EPPS** in connection with the business, transaction, and series of transactions of the Mississippi Department of Corrections, involving something of value of \$5,000.00 or more, that is, the awarding and the retention of multiple contracts to AdminPros, LLC for medical vendor monitoring and Medicaid eligibility services.

All in violation of Section 666(a)(2), Title 18, United States Code.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

As a result of committing the offense alleged in this Indictment, the defendant shall forfeit to the United States all property involved in or traceable to property involved in the offenses, including but not limited to all proceeds obtained directly or indirectly from the offenses, and all property used to facilitate the offenses.

Further, if any property described above, as a result of any act or omission of the defendant: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court;

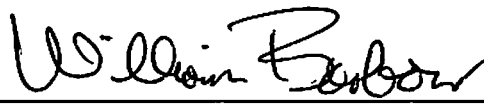
(d) has been substantially diminished in value; or (e) has been commingled with other property, which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture of any other property of the defendants, up to the value of the property described in this notice or any bill of particulars supporting it.

All pursuant to Section 981(a)(1)(A) & (C), Title 18, United States Code and Section 2461, Title 28, United States Code.


HAROLD BRITTAIN
Acting United States Attorney

A TRUE BILL:
S/SIGNATURE REDACTED
Foreperson of the Grand Jury

This indictment was returned in open court by the foreperson or deputy foreperson of the grand jury on this the 13th day of July, 2016.


UNITED STATES DISTRICT JUDGE